

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT****Division of Housing Policy Development**

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December 30, 2004

Mr. Richard P. Holmer  
City Manager  
City of Riverbank  
6707 Third Street  
Riverbank, CA 95367

Dear Mr. Holmer:

**RE: Review of the City of Riverbank's Adopted Housing Element**

Thank you for submitting Riverbank's amended housing element adopted on December 27, 2004 along with technical changes as referenced in Resolution No. 147. The Department is required to review adopted housing elements and report the findings to the locality pursuant to Government Code Section 65585(h). Telephone conversations with Mr. Jeffrey Goldman, the City's consultant, facilitated the review. As requested, the Department has expedited its review to facilitate the City's application for Workforce Housing Incentive Grant funds.

The adopted element, along with technical changes as referenced in Resolution No. 147 adequately address the statutory requirements described in the Department's March 15, 2004 review. Therefore, the Department is pleased to find the adopted housing element in compliance with State housing element law (Article 10.6 of the Government Code). The adopted element now includes a program to rezone 65 acres to R-3 or equivalent zoning, allowing at least 20 dwelling units per acre and to annex and zone a minimum of 15 acres R-3 to accommodate multifamily housing development. The element also includes stronger program actions to assist in the development of housing affordable to Riverbank families and workers.

For your information, recently enacted legislation (Chapter 706, Statutes of 2002, Government Code Section 65863) requires local governments to ensure its inventory of adequate sites can accommodate its share of the regional housing need throughout the planning period. Further, Government Code Section 65863(b) prohibits local governments from lowering a residential density below that utilized by the Department in determining compliance with housing element law unless the locality makes certain findings.

The Department looks forward to receiving Riverbank's annual implementation report required pursuant to Government Code Section 65400. The report should demonstrate the City's progress in implementing its housing element with particular focus on Programs 1.1a-c. The annual implementation reports are required to be submitted to the local legislative body and this Department by October 1.

The Department wishes Riverbank much success in implementing its housing and land use strategies and looks forward to following the City's progress in implementing its housing element. If we can provide any assistance in implementing the housing element, please contact Mario Angel, of our staff, at (916) 445-3485.

In accordance with requests pursuant to the Public Records Act, we are forwarding copies of this letter to the persons and organizations listed below.

Sincerely,



Cathy E. Creswell  
Deputy Director

cc: J. Matthew Gerken, Consultant, Cotton/ Bridges/ Associates  
Mark Stivers, Senate Committee on Transportation & Housing  
Suzanne Ambrose, Supervising Deputy Attorney General, AG's Office  
Terry Roberts, Governor's Office of Planning and Research  
Nick Cammarota, California Building Industry Association  
Marcia Salkin, California Association of Realtors  
Marc Brown, California Rural Legal Assistance Foundation  
Rob Weiner, California Coalition for Rural Housing  
John Douglas, AICP, Civic Solutions  
Deanna Kitamura, Western Center on Law and Poverty  
S. Lynn Martinez, Western Center on Law and Poverty  
Alexander Abbe, Law Firm of Richards, Watson & Gershon  
Michael G. Colantuono, Colantuono, Levin & Rozell, APC  
Ilene J. Jacobs, California Rural Legal Assistance, Inc.  
Richard Marcantonio, Public Advocates  
Miguel B. Donoso, Hispanic Task Force  
Eugene Smith, Tulare Co. Bldg. & Planning Department